

Compliance Assessment Report

Report ID:
CAR_NRW0024820

This form will report compliance with your permit as determined by an NRW officer

Site	Oakenholt Mill EPR/BJ9681IX	Permit Ref	BJ9681IX		
Operator/Permit holder	SCA Hygiene Products UK Limited				
Regime	Installations				
Date of assessment	30/06/2016	Time in	N/A	Out	N/A
Assessment type	Check Monitoring/Sampling				
Parts of the permit assessed	Monitoring and Shedule 5 notifications				
Lead officer's name	Ellis, Rhys				
Accompanied by					
Recipient's name/position	Mike King/ Environmental Advisor	Date issued	16/08/2016		

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our Compliance Classification Scheme (CCS). CCS Scores can be consolidated or suspended where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your local office.

Permit conditions and compliance summary	CCS Category	Condition(s) breached
E3 - Emissions - Surface water	C3	3.1.2
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	C4	4.3.2

KEY: See Section 5 for breach categories, suspended scores will be indicated as such.

A = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,

O = Ongoing non-compliance, not scored.

Number of breaches recorded	2	Total compliance score (see section 5 for scoring scheme)	4.1
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If the Number of breaches recorded is greater than zero, please see Section 3 for our proposed enforcement response

Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- The part(s) of the permit that were assessed (eg. Maintenance, training, combustion plant, etc)
- Where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- Any non-compliances identified
- Any non-compliances with directly applicable legislation
- Details of any multiple non-compliances
- Information on the compliance score accrued inc.
- Details of advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

E3) Emissions to surface water.

G4) Monitoring and records, maintenance and reporting. – Reporting and Notification

Thank you for submitting reporting of emissions to water (other than to sewer) and land, and completing the performance indicators for the period of 01/04/2016 to 30/06/2016

Permit condition 3.1.2 stipulates that the limits given in Schedule 3 shall not be exceeded.

Breaches of limits in regards to Suspended solids have been noted and temperature was close to exceeding the emission limit value.

Substance / Parameter	Emission Limit Value	Result
Suspended Solids	50 mg/l	149mg/l
Temperature	25 °c	24.8 °c

ACTION 1.

Please can the site provide any further information to the cause of this high reading, if there are any. Please respond no later than 5th September 2016.

There has been a breach in condition 3.1.2 as a consequence of exceeding the limits in schedule 3 of your permit that could foreseeably result in pollution, as a result a CCS 3 breach has been noted.

On May 2016 a schedule 5 notification form was received. The report advised that approximately 100 litres of oil was spilt, the site estimated that 20/25 litres entered the plant. Internal suspended solids test showed a result of 149ppm against the permit limit of 50 ppm.

On 15th April 2016 Natural Resources Wales received a schedule 5 form notifying another breach in suspended solids of 72 ppm against the permit limit of 50ppm, In response to this the site had put the ETP back into re circulation and dilution water was added to the system.

As there has been a limit exceedance related to a permitted discharge to surface water that could foreseeably result in pollution a CCS breach of 3 has been noted. However this CCS breach is consolidated into the CCS breach above.

For both schedule 5 notifications above we have not received Part B of schedule 5, which should be detailing additional accurate information in relation to the root cause of the incident and measures implemented to limit or prevent further pollution of the environment. Due to the failure to submit a Part B notification a CCS3 breach of 4 has been applied under permit condition 4.3.2.

It is also worth noting that another Schedule 5 notification dated 15th July 2016 was received by Natural Resources Wales. This was to support a notification that you provided by telephone to Alison Soper of potential of release to estuary, in which you experienced two high results for suspended solids of 83ppm and 59ppm against the permit emission value of 50 mg/l.

It was advised that the site had a spill of blue dye on site which entered the effluent plant and the production

went into shut down, it was also explained that the ETP went into recirculation for a few hours whilst diluting it down.

No part B notification has been received in regards to this event.

Site should ensure that all outstanding Schedule 5 part B notifications are submitted in addition to reviewing its staff training and Environmental management system and associated procedures for completing Schedule 5 notifications.

ACTION 2

It appears that suspended solids seem to be a repeating breach. It also appears that the uncontrolled release of foreign substances to the ETP is a repeating issue on site (oil , dye etc) . Please can the site provide information of measures taken to avoid similar incidents of uncontrolled discharges to the ETP and measures taken to avoid further suspended solids breaching permit conditions. Please respond no later than 31st August 2016.

ACTION 3.

You have previously discussed the potential of installing a primary settlement at the Effluent Treatment Plant. Given the recent exceedances of the Emission Limit Value please provide an update on the development of the Effluent Treatment Plant. Please respond no later than 5th September 2016.

ACTION 4:

Your permit does stipulate that you are taking 24 hour flow proportional composite sample, please can the site provide the raw data and data inform of a graph for the suspended solids since January 2016.

Permit conditions and monitoring forms.

Please note that the following discrepancies have been noted with your current permit and reporting forms .

- Current performance form should have units in Kg/t and not Kg for BOD, Suspended solids, Total Nitrogen, Total Phosphorus.
- The temperature should be 25 and not 40 on the 'water 1' form
- There is an error with Table S4. It stipulates 'emissions to water parameters as required by condition 3.5.1'. This should be 3.3.1

These are in the process of being corrected by our permitting team. In the meantime please can the site submit details for the parameters measured in the correct units as stipulated above and take note of the discrepancies in the permit.

Improvement conditions

Table S1.3 of your permit stipulates improvement that are required to be completed within specific timescales. Improvement condition 6 requires the operator to complete a noise survey on the new PM2 dust extraction system once it has been installed, to compare actual results with modelled results included in the application and submit it to NRM by 1st September 2016.

Improvement condition 7 , 8 , 9 10 and 11 are also due for 30th September 2016.

ACTION 5

Please can the site provide an update in regards to these improvement conditions by no later than 5th September 2016

Once a response has been received to all of the actions stipulated in this CAR Form it would be beneficial to meet on site to discuss this further.

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EPR Compliance Assessment Report

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Operator/Permit holder	SCA Hygiene Products UK Limited	Date	30/06/2016

Section 3 – Enforcement Response

You must take immediate action to rectify any non-compliance and prevent repetition. Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

In respect of the above non-compliance you have been issued with a warning. At present we do not intend to take further enforcement action. This does not preclude us from taking additional enforcement action if further relevant information comes to light or offences continue.

Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

Criteria Ref.	CCS Category	Action required/advised	Due Date
See Section 1 above			
G4	C4	Site to ensure that Part B of schedule 5 is completed as soon as practically possible.	05/09/2016
E3	C3	Site to comply with limits set in permit and reply to ACTION 1,2,3 AND 4 in CAR form	05/09/2016

Section 5 – Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- Advise on corrective actions verbally or in writing
- Require you to take specific actions verbally or in writing
- Issue a notice
- Require you to review your procedures or management system
- Change some of the conditions of your permit
- Decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and/or suspension or revocation of the permit.

See our Enforcement and Civil Sanctions guidance for further information

This report does not relieve the site operator of the responsibility to

- Ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- Ensure you comply with other legislative provisions which may apply

Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance that could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

Operational Risk Appraisal (Opra) - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

Section 6 – General information

Data protection notice

The information on this form will be processed by the Natural Resources Wales (NRW) to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s). The NRW may also use and/or disclose it in connection with:

- Offering/providing you with its literature/services relating to environmental matters
- Consulting with the public, public bodies and other organisations (eg. Health and Safety Executive, local authorities) on environmental issues
- Carrying out statistical analysis, research and development on environmental issues
- Providing public register information to enquirers
- Investigating possible breaches of environmental law
- Assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Regulations request

The NRW may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

Disclosure of information

The NRW will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within fifteen working days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

Customer charter

What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with officer's line managers using the informal appeals procedure. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 0300 065 3000 (Mon to Fri 08.00 – 18.00) and ask for the Customer Contact team or send an email to enquiries@naturalresourceswales.gov.uk. If you are still dissatisfied you can make a complaint to the Public Services Ombudsman for Wales. For advice on how to complain to the Ombudsman phone their helpline on 0845 607 0987.

Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.